S. LANE TUCKER United States Attorney

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

VS.

ALONZO WILLIAMS and ALPHONSO WILLIAMS,

Defendants.

No. 3:23-cr-00086-SLG-KFR

COUNT 1

CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES Vio. of 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A)

COUNT 2

POSSESSION OF CONTROLLED SUBSTANCES WITH INTENT TO DISTRIBUTE

Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(A)

COUNT 3

POSSESSION OF FIREARMS IN FURTHERANCE OF DRUG TRAFFICKING CRIME Vio. of 18 U.S.C. § 924(c)(1)(A)(i)

CRIMINAL FORFEITURE

ALLEGATION 1

21 U.S.C. § 853(a)(1) and (2), 28 U.S.C. § 2461(c), and Fed. R. Crim. P. 32.2(a)

<u>CRIMINAL FORFEITURE</u>

ALLEGATION 2

18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Fed. R. Crim. P. 32.2(a)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning on a date unknown to the grand jury, but not later than August 21, 2023, and continuing to on or about August 29, 2023, within the District of Alaska, the defendants ALONZO WILLIAMS and ALPHONSO WILLIAMS, did knowingly and intentionally combine, conspire, confederate and agree to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A).

COUNT 2

On or about August 29, 2023, within the District of Alaska, the defendants, ALONZO WILLIAMS and ALPHONSO WILLIAMS, knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A).

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COUNT 3

On or August 29, 2023, within the District of Alaska, the defendant, ALONZO WILLIAMS, did knowingly and intentionally possess a firearm to wit: a Glock model 20 10mm handgun, during and in relation to drug trafficking crimes as charged in Counts 1 and 2 of this Indictment.

All of which is in violation of 18 U.S.C. § 924(c)(1)(A)(i).

CRIMINAL FORFEITURE ALLEGATION 1

The allegations contained in Count 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853(a)(1) and (2), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

Upon conviction of the offense alleged in Count 2 of this Indictment, the defendants, ALONZO WILLIAMS and ALPHONSO WILLIAMS, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

- 1. Glock model 20 10mm handgun (serial number BXRY312);
- 2. Smith and Wesson model M&P 15 5.56 (serial number TV63739);
- 3. Anderson AM-15 5.56 (serial number 20383378);
- 4. FN PS90 5.7x28 (serial number FN097134);

- 5. Saiga 12 gauge (serial number 13600174);
- 6. DTI 15 5.56 (serial number DTI5031679);
- 7. H&R model M649 .22 lr (serial number AX023801);
- 8. AR-15 style rifle (no serial number);
- 9. Associated magazines and ammunition.

All pursuant to 21 U.S.C. § 853(a)(1) and (2), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

CRIMINAL FORFEITURE ALLEGATION 2

The allegations contained in Count 3 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d); 28 U.S.C. § 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

Upon conviction of the offense in violation of 18 U.S.C. § 924(c), as set forth in Count 3 of this Indictment, the defendant, ALONZO WILLIAMS, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d); 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in knowing violation of the offense, including, but not limited to the following:

- 1. Glock model 20 10mm handgun (serial number BXRY312);
- 2. Smith and Wesson model M&P 15 5.56 (serial number TV63739);
- 3. Anderson AM-15 5.56 (serial number 20383378);
- 4. FN PS90 5.7x28 (serial number FN097134);
- 5. Saiga 12 gauge (serial number 13600174);

	8.	AR-15 style rifle (no serial number);
	9.	Associated magazines and ammunition.
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6. DTI 15 5.56 (serial number DTI5031679);

7. H&R model M649 .22 lr (serial number AX023801);

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

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s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Tara M. Lewis
TARA M. LEWIS
Assistant U.S. Attorney
United States of America

s/ Kate Vogel
S. LANE TUCKER
United States Attorney

DATE: 9/19/2023